

Warner Norcross & Judd LLP
900 Fifth Third Center
111 Lyon Street, NW
Grand Rapids, MI 49503-2487
(616) 752-2413 phone
(616) 222-2413 fax
moneal@wnj.com

Hearing Date and Time: July 31, 2008 @10:00 a.m.

Gordon J. Toering (GT3738)
(Admitted *Pro Hac Vice*)

Attorneys for RT Sub, LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
	:	(Jointly Administered)
Debtors.	:	
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**RESPONSE OF RT SUB, LLC TO DEBTORS'
THIRTIETH OMNIBUS OBJECTION TO CLAIMS (Claim No. 15939)**

RT Sub, LLC f/k/a RecepTec, LLC ("RT Sub") hereby responds to Debtors' Thirtieth Omnibus Objection to Claims dated June 27, 2008 (the "Objection") filed by debtors Delphi Corporation, *et al* (collectively, "Debtors"). This response relates to a proof of claim (#15939) that was amended by Claim Number 16507 filed by RT Sub against Delphi Automotive Systems LLC.

RT Sub states as follows for its response:

The Objection seeks entry of an order disallowing and expunging the unsecured, pre-petition original claim (#15939) (hereinafter defined as the “Original Claim”) of RT Sub on the grounds that it has been amended. Debtors have also objected to the amended claim, Claim number 16507 (the “Amended Claim”) as untimely in their Eleventh Omnibus Objection. The Original Claim should not be expunged or disallowed on the basis that it was amended if the Amended Claim is also determined to be untimely and thus expunged.¹ RT Sub and Debtors have reached a tentative settlement to resolve both objections. RT Sub files this response to preserve its right to object to the Objection in the unlikely event the parties are unable to resolve the objections.

As per Debtors’ request, the address to which Debtors must deliver any reply to this response is:

Michael B. O’Neal
Warner Norcross & Judd LLP
900 Fifth Third Center
111 Lyon Street, NW
Grand Rapids, MI 49503-2487
Ph: (616) 752-2413
Fax: (616) 222-2413
moneal@wnj.com

Further, as per Debtors’ request, the person possessing authority to reconcile, settle, or ultimately resolve the claims on RT Sub’s behalf is George Caston, Authorized Agent, RT Sub, LLC, 4360 Baldwin Road, Holly, Michigan 48442; phone (248) 613-2730.

¹ RT Sub’s response to the Eleventh Omnibus Objection, which is incorporated herein by reference, sets forth the reasons why such claim was not untimely.

WHEREFORE, RT Sub requests that the Court enter an order denying the
Objection and providing such other and further relief as appropriate under the circumstances.

Dated: July 17, 2008

WARNER NORCROSS & JUDD LLP

By /s/ Gordon J. Toering

Michael O'Neal

Gordon J. Toering

(Admitted *Pro Hac Vice*)

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gtoering@wnj.com

Attorneys for RT Sub, LLC

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